

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION**

TIMOTHY M. BROWDER,)	
)	1:05cv10464
Plaintiff,)	
)	Judge Saris
v.)	
)	
NATIONAL FINANCIAL SYSTEMS, INC.,)	
)	
Defendant.)	

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION
TO TAKE DISCOVERY**

Plaintiff Timothy M. Browder respectfully asks the Court to enter an order granting him a 45 day extension in which to complete all fact, class, and expert discovery in this case.

In support of this motion, Plaintiff states as follows:

1. On December 19, 2005, upon the parties' joint motion, the Court entered an order extending the class and fact discovery deadline to February 15, 2006.
2. On January 25, 2006, the Court entered an order extending the deadline for Plaintiff to file his class certification motion to February 20, 2006.
3. On February 14, 2006, Plaintiff filed his motion for class certification.
4. On February 14, 2006, Plaintiff moved to voluntarily dismiss his Mass. G.L., CH. 93A claim. The only remaining claim in the case is a Fair Debt Collection Practices Act ("FDCPA") claim.
5. Plaintiff seeks an additional 45 days to take discovery because he has Rule 30(b)(6) depositions of Defendant still to take. Plaintiff has concluded, however, that he will not

require an expert. Consequently once the 45 days has expired he will have completed all discovery. Plaintiff anticipates moving for summary judgment on his FDCPA claim at the conclusion of the 45 day extension period.

6. Defendant's counsel has indicated that National Financial Systems, Inc. does not have any objection to this motion.

WHEREFORE, Plaintiff respectfully asks the Court to enter an order granting him a 45 day extension in which to complete all further fact, class, and expert discovery in this case.

Respectfully submitted,

s/ Francis R. Greene
Francis R. Greene

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RULE 7.1 CERTIFICATION

I, Francis R. Greene, hereby certify that I have conferred in good faith with counsel for National Financial Systems, Inc. regarding this motion. Defendant's counsel does not object to the filing of this motion.

s/ Francis R. Greene
Francis R. Greene

CERTIFICATE OF SERVICE

I, Francis R. Greene, hereby certify that on February 14, 2006, a copy of the foregoing Plaintiff's Unopposed Motion for Extension to Take Discovery was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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